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FILED VIA ECF

Hon. Jesse M. Furman
United States District Judge
United States Courthouse
Southern District of New York
500 Pearl Street
New York, New York 10007

March 22, 2022

United States v. Orlando CARMONA-SERRANO
(S10) 16 Cr. 387 (JMF)

Dear Judge Furman:

By Order dated March 14, 2022, 2021 (D.E. 666), the Court directed, *inter alia*, counsel to confer regarding whether and how the next status conference in this matter, currently scheduled for March 30, 2022, is to proceed.

On reviewing the text of the actual Order rather than the docket entry, counsel has now seen that a response was due on or before March 16, 2022. Accordingly, counsel apologizes for this oversight and writes now to advise the Court that counsel have conferred and that we seek an adjournment of approximately sixty (60) days on consent. The purpose of the request is to allow the defense additional time to continue to review the very voluminous discovery produced by the government with his client, as well as to obtain translations of numerous documents. The additional time has, in part, been made necessary by the ongoing COVID-19 pandemic and the prevalence of the Omicron variant. As the Court will be aware, this has led to the reimposition of jail protocols impacting counsel's ability to meet with Mr. Carmona-Serrano.

In conjunction with this request, we ask the Court to adjust the motion schedule previously put in place and consent to an exclusion under the Speedy Trial clock in these circumstances.

For these reasons, we ask that the March 30, 2022 status conference in this matter be adjourned until the late morning or early afternoon, on a date in late June that is convenient for the Court.


Finally, Mr. Carmona-Serrano is prepared to waive his right to attend altogether. It is counsel's understanding that the Constitution, the Federal Rules and the CARES Act so permit.

Respectfully submitted,

/s/
HOWARD LEADER

cc: Adam Hobson, Esq.,
Assistant United States Attorney (VIA ECF)

Application GRANTED. Defense motions shall be filed by May 20 2022. The Government's opposition is due by June 3, 2022. Any reply is due by June 10, 2022. The pretrial conference is hereby ADJOURNED to June 2, 2022 at 12:00 p.m. Time is excluded under the Speedy Trial Act from today, March 22, 2022, until June 2, 2022, for the reasons set forth in defense counsel's letter. The Clerk of Court is directed to terminate Doc. #682. SO ORDERED.



March 22, 2022